

From: [ANDERSON Jim M](#)
To: [Eric Blischke/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#)
Cc: [GAINER Tom](#); [MCCLINCY Matt](#); [POULSEN Mike](#); [PETERSON Jenn L](#)
Subject: RE: Summary of Outstanding RI and BRA Issues
Date: 05/06/2008 11:14 AM

Chip & Eric,

I reviewed your 5/5 "Summary of Issues" e-mail. Once again, great job of putting this all together, it's very helpful. I have a couple of comments for you to consider:

1) Refined Screen- In your summary of BERA issues, I didn't see anything re: the issue of whether & how to conduct a refined screen. I understand the potential disagreement is that the LWG wants to use a site-wide 95thUCL, but we're concerned that this would miss substantial risk at a few individual sites. Have we dropped the idea of doing a refined screen at all?

2) Individual- vs population-level BERAs- In your summary of BERA issues, I didn't see anything re: this issue either. EPA will soon make our position clear to the LWG re: lamprey, but I understand there is still some uncertainty how to run an individual-level BERA on T&E species. One suggestion was to use NOAEL for T&E species individuals & use LOAELs for populations.

3) RI-Issues- Background- One other thing we discussed in the 5/1 mtg was that you would check with other Region 10 sites to make sure our use of background was generally consistent with other Superfund sites.

4) TZW- You state that the estimation of theoretical TZW concentrations based on sediment chemistry is not needed since we agreed not to evaluate TZW in the HH BRA. Is the reason you don't think TZW concentrations are needed for the BERA is because pore water was analyzed as part of the bulk sediment samples?

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-----Original Message-----

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Sent: Monday, May 05, 2008 3:45 PM
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Subject: Summary of Outstanding RI and BRA Issues

Below is a summary of recently resolved and outstanding RI and BRA Issues as I understand them. Please let me know if I missed or misunderstood anything. Outstanding issues are in bold text. This summary builds off the broader issue summary that Chip sent out on April 29, 2008.

Human Health Risk Assessment - Discussed April 30, 2008:

Estimation of surface water concentrations for the drinking water scenario. Depth integrated samples will be evaluated in the baseline risk assessment. Each sample will be evaluated independently and a site-wide average will also be calculated. Individual station locations that will be looked at include the 5 site transects (RM 2, 4, 7, 11 and Multnomah Channel) and the three locations where depth integrated data is available (Cathedral Park, Willamette Cove and upper end of Swan Island Lagoon).

Clam tissue EPCs: For each river mile, the maximum detected concentration in clam composites will be used as the RME. The average composite tissue concentration will be used as the CTE. A site-wide EPC will also be calculated.

Carp: Each group of composites will be looked at individually - RM 3 - 6, 6 - 9, 9 - 12, 12 - 15 and 15 - 18. A site-wide EPC will also be calculated.

Smallmouth Bass: The question is whether to develop an EPC on a RM by RM basis or to evaluate each side of the river independently. This issue is unresolved. Further internal discussion is required to finalize agency position.

Ecological Risk Assessment - Discussed April 30, 2008:

Tissue-based TRVs: The government team is developing a tissue-based TRV methodology. This document is under review by the eco-team. Unresolved. Need to finalize and transmit the TRV methodology.

RSET vs. Status and Trends Evaluation of Sediment Bioassays. This issue is unresolved. The LWG agreed to provide more detail regarding application of the RSET approach to the Portland Harbor site.

Floating Percentile Model - an updated (less subjective/more transparent) version of the FPM model is expected to be available in the next two months. EPA likely will be OK with this but still wants linear regression model to be used as another LOE.

Buried Sediment: At this time the likely resolution is for the LWG to perform the erosion scenario as part of the risk assessment. Only short-term risk scenarios will be considered (i.e., risk to the benthic community). Sediment PRGs will be applied to subsurface sediments for the purpose of developing volume estimates for the FS.

RI Issues:

Background Calculations: This was on May 1, 2008. See my email dated May 2, 2008 for a summary. Four issues related to the RI and BRA remain

unresolved: Non-Detect Substitution, Identification of Outliers, Organic-carbon normalization, and Identification of Data sets for

background (e.g., what is to be included for each matrix). A subgroup was identified (Burt Shephard, Bob Dexter and Mike Poulsen for the government team) and a meeting scheduled for May 9, 2008 to develop recommendations for the broader group. We expect these

issues to be discussed by the broader EPA/LWG group on May 14, 2008.

Data Presentation: A summary of the various chemical lists was distributed on April 30, 2008. Discussed preliminarily on May 1, 2008. Remains unresolved. Further discussion of the various chemical lists is required.

TZW: There are number of resolved and unresolved issues associated with TZW.

- 1) The application of fish consumption AWQC as relevant and appropriate for TZW. Because the LWG has agreed to evaluate TZW against fish consumption AWQC as a line of evidence in the BRA, this issue of whether fish consumption AWQC are ARARs has been tabled to the PRG discussion.
- 2) The estimation of theoretical TZW concentrations based on sediment chemistry results and application of partitioning factors. This approach was raised as a way to supplement the existing TZW data. However, since it was agreed not to evaluate TZW in the baseline HHRA, the supplemental data is not needed. It was agreed that this sort of partitioning analysis could be used to develop and understanding of chemical mobility or could be compared to sediment PRGs for the clam consumption scenario developed based on application of site specific BSAFs. These issues are resolved relative to the June 1, 2008 RI and BRA deadline.
- 3) Background levels of certain metals. For TZW and background levels of As, Ba, and Mn, it was agreed that the LWG would develop literature estimates for the concentration of naturally occurring metals resulting from dissolution associated with naturally induced reducing conditions.
- 4) Evaluation of deep TZW data: This issue has not been discussed fully. However, it has generally been agreed that the shallow TZW would be used in the BRA. Deeper TZW will be evaluated to support other elements of the RI such as chemical partitioning and mobility and the evaluation of the groundwater discharges to the river.

Degradation Rates: Not discussed further. Still unresolved.

PRGs, AOPCs, RGs and SMAs: Not an RI/BRA issue.

CSM: See chemical lists above. Related to forthcoming EPA comments on Section 11.

Pacific Lamprey. Decision on whether to evaluate lamprey at the individual level remains unresolved. Further internal discussion required to develop response to LWG position.

Breast-feeding: Further internal discussion required.

Milestone Meeting Issues: There were a number of issues raised by the LWG at the milestone meeting as potential dispute items. It was agreed to extend the dispute deadline to May 1, 2008 in order to allow time to resolve through technical discussion. This was generally achieved. A summary of these issues is attached. Two issues remain outstanding - degradation rates and lamprey - these are summarized above.

I plan on going over this list during the TCT meeting scheduled for this week.

Thanks, Eric

(See attached file: EPAREvisedResolutiontable043008B.doc)